

Andrew G. Dietderich
Brian D. Glueckstein
Alexa J. Kranzley
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, NY 10004-2498
Telephone: (212) 558-4000
Facsimile: (212) 558-3588

*Counsel to the Debtors
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

	X	
In re	:	Chapter 11
	:	
PRIMORSK INTERNATIONAL SHIPPING	:	Case No. 16-10073 (MG)
LIMITED, <i>et al.</i> , ¹	:	
	:	Jointly Administered
Debtors.	:	
	X	

**DEBTORS' RESPONSE TO REQUEST BY NORDEA BANK NORGE ASA,
AS FACILITY AGENT, FOR STATUS CONFERENCE**

Primorsk International Shipping Limited ("Primorsk"), and certain of its affiliated debtors and debtors-in-possession (collectively, the "Debtors"), hereby file this response to the *Request by Nordea Bank Norge ASA* ("Nordea"), *as Facility Agent, for Status Conference* [Docket No. 94] and respectfully state as follows:

1. Nordea did not contact the Debtors prior to filing a ten-page, self-serving document that ostensibly is a request for an immediate status conference. The Debtors' counsel

¹ The Debtors in these chapter 11 cases and, if applicable, the last four digits of their U.S. taxpayer identification numbers are: Primorsk International Shipping Limited (Cyprus), Boussol Shipping Limited (Cyprus) (6402) – m/t “Zaliv Amerika”, Malthus Navigation Limited (Cyprus) (6401) – m/t “Zaliv Amurskiy”, Jixandra Shipping Limited (Cyprus) (6168) – m/t “Prisco Alexandra”, Levasser Navigation Limited (Cyprus) (0605) – m/t “Prisco Ekaterina”, Hermine Shipping Limited (Cyprus) (0596) – m/t “Prisco Irina”, Laperouse Shipping Limited (Cyprus) (0603) – m/t “Prisco Elizaveta”, Prylotina Shipping Limited (Cyprus) (6085) – m/t “Prisco Elena”, Baikal Shipping Ltd (Liberia) (6592) – m/t “Zaliv Baikal” and Vostok Navigation Ltd (Liberia) (1745) – m/t “Zaliv Vostok”.

are available at the Court's convenience, including on Friday, March 11 at 11:00 a.m., if the Court is inclined to hold a status conference in advance of the omnibus hearing scheduled for March 22.

2. Of course, Nordea could have simply asked the Debtors to agree to its request for a status conference. Instead, Nordea's filing contains premature plan objections with respect to a plan of reorganization that has not yet even been filed. While the Debtors disagree with the substance of Nordea's filing, the arguments being tested are not ripe and are not related to anything pending before the Court.

3. As Nordea is well aware, the Debtors will file a plan of reorganization next week, on or before March 15, 2016. The Debtors advisors have been responding regularly to diligence and information requests from Nordea's financial advisor. The Debtors' plan will be accompanied by a disclosure statement, a motion seeking approval of the disclosure statement and solicitation procedures, and a motion to establish a plan confirmation litigation schedule. Moreover, the Debtors and Nordea appear to agree that any plan litigation should move forward promptly. The Debtors intend to discuss the plan confirmation litigation schedule with Nordea, and to work to reach consensus with all of its significant stakeholders on that schedule.

4. The Debtors expect that Nordea and the other lender parties will read the plan of reorganization and accompanying documents filed with the Court, and, only after considering the plan terms and underlying business plan, form a view. There will of course be a process for Nordea or any other lender to object to confirmation of the plan of reorganization in due course if that is their chosen path. The Debtors are, however, entitled to file their plan and seek confirmation pursuant to section 1129 of the Bankruptcy Code, and intend to do so.

5. The Debtors remain available and willing to negotiate a consensual restructuring, and prefer consensus be achieved. The Debtors expect that plan negotiations will resume in earnest after their plan is filed next week.

Dated: March 9, 2016
New York, New York

/s/ Brian D. Glueckstein

Andrew G. Dietderich
Brian D. Glueckstein
Alexa J. Kranzley
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
Email: dietdericha@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

*Counsel to the Debtors and
Debtors-in-Possession*